

# VERMONT YANKEE NUCLEAR POWER CORPORATION

PROPOSED CHANGE #156



Ferry Road, Brattleboro, VT 05301-7002

BVY 90-022

REPLY TO  
ENGINEERING OFFICE  
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BOLTON, MA 01740  
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March 5, 1990

U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Attention: Document Control Desk

References: a) License No. DPR-28 (Docket No. 50-271)  
b) Letter, USNRC to All Licensees of Operating Plants  
(Generic Letter 89-14), NVY 89-188, dated 8/21/89

Dear Sir:

Subject: Proposed Change to Vermont Yankee Technical Specifications:  
Removal of the 3.25 Limit on Extending Surveillance Intervals

## PROPOSED CHANGE

Replace page 4 of the Vermont Yankee Technical Specifications with the attached revised page 4. The proposed change revises definition "Y", Surveillance Frequency. Specifically, this proposed change eliminates the 3.25 limit on extending surveillance intervals as recommended by Reference b).

## REASON AND BASIS FOR CHANGE

This change is recommended by NRC Generic Letter 89-14. Removal of the 3.25 limit will eliminate an unnecessary restriction on extending surveillance requirements. The use of the allowance to extend surveillance intervals by 25% can also result in a significant safety benefit for surveillances that are performed on a routine basis during plant operation. This safety benefit is incurred when a surveillance interval is extended at a time that conditions are not suitable for performing the surveillance. Also, there is the administrative burden associated with tracking the use of the 25% allowance to ensure compliance with the 3.25 limit. On the basis of these considerations, the removal of the 3.25 limit will have an overall positive impact on safety.

## SAFETY CONSIDERATIONS

The change proposed by this amendment request does not present any unreviewed safety questions as defined in 10CFR50.59. The proposed change is consistent with the requirements of Reference b). The 25% extension

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limit for surveillance test intervals remains unchanged. The surveillance testing program, as defined in the Vermont Yankee Technical Specifications and controlled by approved licensee administrative procedures, is unaffected by this proposal. This proposed change has been reviewed by PORC and NSARC.

#### SIGNIFICANT HAZARDS CONSIDERATIONS

The standards used to arrive at a determination that a request for amendment involves no significant hazards considerations are included in the Commission's regulation, 10CFR50.92. 10CFR50.92 states that a proposed amendment does not: 1) involve a significant increase in the probability or consequences of an accident previously evaluated; 2) create the possibility of a new or different kind of accident from any accident previously evaluated; or 3) involve a significant reduction in a margin of safety. The discussion below addresses each of these three criteria and demonstrates that the proposed amendment involves no significant hazards considerations.

The removal of the 3.25 limit on extending surveillance intervals from definition "Y", Surveillance Frequency, of the Vermont Yankee Technical Specifications simply deletes a restrictive administrative control from the Surveillance Testing Program. The testing required by Vermont Yankee's Technical Specifications remains in effect without any changes. Thus, the proposed change does not involve an increase in the probability or consequences of an accident previously evaluated. It has been determined (see Generic Letter 89-14) that the change in this limit permits an allowable extension of the normal surveillance interval to facilitate surveillance scheduling and consideration of plant operating conditions that may not be suitable for conducting the surveillance and reduces the administrative burden associated with its use, therefore has a positive affect on safety.

The proposed change does not create the possibility of a new or different kind of accident previously evaluated because no physical alterations of plant configuration, changes to setpoints, or safety limits are proposed. As stated above, the removal of the 3.25 limit does not influence, impact, or contribute to the probability or consequences of an accident. The Technical Specifications will continue to control the surveillance testing program and appropriate actions will be taken when or if specified test intervals are extended or tests are missed.

The proposed change does not involve a significant reduction in a safety margin because it does not affect operating practices, limits, or safety related equipment. The margin of safety provided by the current technical specifications remains unchanged.

